

II. REMARKS

Reconsideration and allowance of the subject application are respectfully requested.

Claims 1, 4-26, 28-42, 44-52, 54-64, and 66-95 are pending in the subject application. Claims 1, 23, 42, 51, 56, 62, 68, 74, 79, and 85 are independent. In this Amendment, Claims 1, 23, 51, 56, 62, 64, 74, 85 and 86 have been amended to address the objections noted by the Examiner at pages 3-4 of the Office Action.

Claims 1, 4-26, 28-42, 44-52, 54-64, and 66-95 were rejected as being unpatentable over Ishikawa, Komori, Haskin, Byrd, Saund, and Kuno, for the reasons discussed on pages 4-51 of the Office Action. The Examiner takes Official Notice of various alleged facts and concepts on pages 17-18, 20-21, 23, 24, 30, 32, 34, 36, 37, 49, and 50-51 of the Office Action. Applicants respectfully traverse all art rejections.

The Examiner has rejected the claims primarily on the basis of Japanese Published Application No. 09-224111 to Ishikawa either alone or in combination with Japanese Published Application No. 08-108689 to Komori, U.S. Patent No. 5,790,910 to Haskin, U.S. Patent No. 6,663,328 to Byrd et al., U.S. Patent No. 6,570,612 to Saund et al. and/or U.S. Patent No. 6,567,121 to Kuno. Applicants respectfully submit that the Examiner's rejections in view of the cited references should be removed.

The primary reference (Ishikawa) relied upon by the Examiner shows an electronic blackboard comprising an image sensor that captures images of a writing surface. Each channel of the image sensor is processed differently. The red channel of

the image sensor is processed using a character discriminator, the green channel of the image sensor is processed using a straight line discriminator and the blue channel of the image sensor is processed using an arbitrary graphics discriminator. Ishikawa thus discriminates between characters, straight lines and graphics so that they can be recognized separately and uses the level of red, green and blue colors to do this. Information input on the writing surface of the Ishikawa electronic blackboard is therefore divided into three parts, namely characters, linear lines and graphics. Colored pens are the tools used to enable the electronic blackboard to perform the above discrimination. Through use of color filters, if red (R) is the predominate color of information input on the writing surface then a character is recognized. If green (G) is the predominate color of information input on the writing surface then a linear line is recognized. If blue (B) is the predominate color of information input on the writing surface then a graphic is recognized.

The Examiner alleges that the “electronic characters and electronic graph[ic]s...are sent to the subsequent character-graph[ic] synthesizing device 20 and simultaneously synthesized with the graph[ic]...thus, a high quality electronic document is created and is output from the output device 21.” From this, the Examiner concludes that everything written on the writing surface of the Ishikawa electronic blackboard is captured. Applicants respectfully submit that the Examiner’s conclusion is simply incorrect.

The Ishikawa electronic blackboard is only capable of detecting red, blue and green pen strokes on the writing surface that are made using the red, blue and

green pen tools. The output image of the Ishikawa electronic blackboard therefore does **NOT** include all visible pen strokes on the writing surface irrespective of the pen tool used to make the pen strokes or irrespective of pen stroke color. Writing on the Ishikawa electronic blackboard that is in a color other than red, blue and green is simply not detected by the image channel sensors and is thus, not processed in any manner.

Independent claims 1, 23, 74 and 79 recite that the image data is processed to form an output digital image of the writing surface including ***all visible writing thereon irrespective of color***. As the Examiner will appreciate from the discussion above, Ishikawa does not form an output image that includes all visible writing on the electronic blackboard irrespective of color. The images generated by Ishikawa only include red, green and blue writing on the electronic blackboard. Visible pen strokes in any other color are not detected and as a result do not form part of the Ishikawa output image. Accordingly, contrary to the Examiner's allegations Ishikawa simply does not disclose the Applicants' invention as defined.

Independent claims 42, 51, 56, 62, 68 and 85 recite that the image data is processed to form an output digital image of the writing surface including ***all visible pen strokes thereon irrespective of pen tool used to make the pen strokes***. Again, as the Examiner will appreciate from the discussion above, Ishikawa does not form an output image that includes all visible pen strokes on the electronic blackboard irrespective of the pen tool used to make the pen strokes. The images generated by Ishikawa can only include red, green and blue pen strokes on the electronic blackboard. Visible pen strokes made using a pen tool of any other color are not detected and as a

result do not form part of the Ishikawa output image. Accordingly, Ishikawa simply does not disclose the Applicants' invention as defined.

The remaining references fail to overcome the deficiencies of the Ishikawa reference. Accordingly, the claims submitted herewith are believed to distinguish patentably over the cited prior art and should be allowed.

In view of the above amendments and remarks, it is believed that this application is now in condition for allowance, and a Notice thereof is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 625-3507. All correspondence should continue to be directed to our address given below.

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